

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND FACSIMILE

August 30, 2016

The Honorable Frank Maas
 United States District Court for the
 Southern District of New York
 Daniel Patrick Moynihan United States
 Courthouse
 500 Pearl Street, Room 740
 New York, NY 10007-1312

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

The Plaintiffs' Executive Committees, on behalf of all plaintiffs, and defendant World Assembly of Muslim Youth ("WAMY"), write to jointly request an extension of the existing deadline for submission of plaintiffs' motion to compel as to WAMY. Counsel for WAMY recently informed plaintiffs that although the defendant expected to complete its document production by July 31, 2016, WAMY requires more time to complete the review and production of additional relevant materials. According to WAMY, it expects to conclude that document review and production by November 30, 2016, with the possibility for further extension to the end of December 2016.

In the past six months, WAMY has produced over 300,000 pages of mostly Arabic documents (WAMYSA185707-494277). In total, WAMY's production has been over 500,000 pages, with more on the way. Plaintiffs submit the on-going process of analyzing the defendant's documents in advance of plaintiffs' motion will take considerable time, given the volume of the production and need to translate most documents. Plaintiffs conferred with counsel for WAMY and the parties respectfully request an extension of the deadline to file any motions to compel as to defendant WAMY to February 28, 2017.

The parties thank Your Honor in advance for the Court's attention to this matter.

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Respectfully submitted,



J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

cc: MDL Counsel of Record (via ECF)
Omar T. Mohammedi, Esq.
Frederick J. Goetz, Esq.

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